October 31, 2014

Director Sara Parker Pauley
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

RE: Comments on the Draft Missouri Nutrient Reduction Strategy

The Missouri Corn Growers Association (MCGA) and the Missouri Soybean Association (MSA) submits the following comments on the draft Missouri Nutrient Reduction Strategy (Strategy). These comments are in addition to the comments submitted by Barr Engineering on behalf of several organizations, which included MCGA and MSA.

For over 50 years, the Missouri Corn Growers Association and the Missouri Soybean Association has worked with generations of crop farmers to achieve monumental milestones and advances in Missouri's agriculture industry. As grassroots organizations, MCGA & MSA invests considerable time and resources in supporting and promoting advances in crop production, grower profitability and environmental stewardship. MCGA and MSA is committed to working with both our growers and our partners in developing and applying cutting edge tools, practices and technology to Missouri farm fields.

Encompassing food, feed, fiber, and fuel production, agriculture is Missouri's leading industry. Farmland represents about 65% of the state's total land base which support more than 100,000 individual farm operations and over 3,000 related agribusinesses. Given this, Missouri farmers are the primary stewards of our state's privately owned land and quality water is vital to the success of Missouri agriculture. With this tenet in mind, the Missouri Corn Growers and Missouri Soybean Association purposely engaged on this issue early on. Contributing technical expertise and policy direction, staff participated on the stakeholder committee, voicing our position and contributing to its content. Our position - that any action related to agricultural farmland must focus squarely on the voluntary adoption of proven conservation practices. Why is this - because the path to sustainable and material improvements to water quality is found in voluntary approaches supported by farmers, not through the pursuit of costly regulatory schemes or new onerous regulation. This position is not unsubstantiated, as past successes have clearly demonstrated the utility and effectiveness of this position and approach.

Follow a Voluntary-Based Approach - We concur and are pleased to see that the Strategy seeks to follow an adaptive management approach, focusing efforts on practical and proven actions, using voluntary and cost effective approaches, many which are already implemented by producers across the state. On page 7, the Strategy states: "*These challenges are best met through the implementation of proven approaches, development of new technologies and practices, promoting increased awareness of best management practices, continued scientific research and developing greater understanding of the effectiveness of various approaches to reduce nutrients entering our waterways*". The next paragraph goes on to say that: "*In addition, heavy rainfall events and weather variability makes the elimination of nutrient losses from urban areas and agricultural lands extremely difficult even when BMP's are in place…..many significant uncertainties remain in solving the nutrient loading issue. This strategy, therefore, takes an adaptive management approach by focusing on the next five years of implementation and learning to guide*

actions in subsequent years." We concur with this statement and conclude that the Strategy will give producers a menu of practical options to consider while providing the industry and our partners areas to focus on, all which will contribute to the adaptive management approach and enhance environmental stewardship efforts on Missouri farms.

Replicating Past Successes - Excessive soil erosion and nutrient runoff is detrimental to the long-term viability of agricultural production as well as to the quality of our rivers, lakes and streams. This is in no way a new concept to Missouri's agricultural producers as they have already made tremendous strides in improving environmental stewardship on farmland. Over the last several decades substantial investments have been made in reducing soil erosion, implementing conservation practices, adopting new tillage practices, using more precise fertilizer and pesticide application practices, installing grass waterways, and as well as many other actions that have improved overall land stewardship. There is little doubt and the evidence supports that these efforts have made substantial material improvements both on the land and to quality of water in Missouri. We are pleased to see the Strategy document this critical fact which is a testament to the effectiveness of the voluntary based approach. Supported by scientific data, on page 37 the Strategy states that: "*Their models predict that conservation practices already implemented on cultivated lands have reduced nitrogen loss by 28% and phosphorus loss by 45% relative to a baseline without those practices……Missouri has documented a 45-50% reduction in soil erosion rates on agricultural lands during the period from 1982 until 2010 (USDA, 2010).*"

Avoid Quick-Fix Solutions – Moving forward, everyone will be well served if resources and policies stay focused on economically viable approaches that deliver results in the long term. The focus and goal of nutrient reduction strategies and policies should not be on meeting certain numeric limits on nutrients in a particular water or "stopping hypoxia" in the Gulf of Mexico. That will take time, along with cooperation from weather, and the management of preexisting conditions to achieve such a set of goals.

During the NRS committee meetings, there were times when certain stakeholders voiced rather unreasonable expectations for changes in nutrient reduction, water quality and for adoption rates of practices; expectations that are likely impossible to achieve. The impairment of water bodies and hypoxia in the Gulf are all highly complex issues impacted by the cumulative effects of numerous natural and man-made activities spread across diverse landscapes which occurred over a significant period of decades or even centuries. Couple this together with unpredictable weather, these impairments will not be solved overnight nor with quick fix regulatory solutions, arbitrary limits, or unwise polices that result in finger pointing.

All facets of the public have a role to play in this and near term goals should focus on approaches that will deliver long term results - for corn and soybean farmers, this includes advancing nutrient stewardship on Missouri farmland. We must encourage and promote practices that are practical and reasonable from the perspective of a producer and farmer, not from the perspective of state or federal officials or other public interest groups. This type of effort will produce improvements that can be verified and measured and will provide steady reduction in water quality impairments over the long term.

In conclusion - Missouri corn and soybean farmers care about our natural resources and want to protect them for future generations. We believe this Strategy will keep us at the forefront of that goal using voluntary, cost-effective and science-based practices and actions to steadily improve water quality over time and across the state. The use of an adaptive management approach with voluntary-based proven practices will also play a crucial role as farmers review their decisions and changing conditions to improve upon nutrient use and ultimately minimize nutrient loss.

Thank you for considering these comments. We look forward to continued collaborative efforts on nutrient reduction and look forward to working with the Department to further develop and implement this Strategy.

Sincerely yours,

Kevin Hurst, President
MISSOURI CORN GROWERS ASSOCIATION

DocuSigned by:
2DD10AE9465B4A5...

Tom Raffety, President
MISSOURI SOYBEAN ASSOCIATION